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*Attorney for Defendant, Rahdsma Henderson*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MIRIAM ELIZABETH SUAREZ-CONTRERAS  
(1), aka "Ella" aka "Liz",  
RAMIRO RAMIREZ-BARAJAS (2),  
aka "Sergio",  
ROBERTO BLANCAS-MATA (3),  
aka "Carlos Delgado",  
**RAHDSMA HENDERSON (4)**, aka "Weezy"  
STEPHEN LLOYD (5),  
CHARLES PARR (6), aka "Charles Magnuson",  
DOUG STUMPF (7),  
BRIAN SCARBOROUGH (8),  
RENEA BARNES (9), aka "Renea Valdez",  
QUENTIN ARMSTRONG (10),  
CIPRIANO PINEDA-ACEDO (11),  
JOSE GUILLERMO TELLO-ALBARRAN (12),  
and MARTHA PEDRAZA-ZAMORA (13),

Defendants.

CASE NO. 2:19-cr-0133-APG-VCF

**AMENDED STIPULATION AND  
ORDER TO CONTINUE MOTIONS  
(THIRD REQUEST)**

**IT IS HEREBY STIPULATED AND AGREED** by and between Nicholas A. Trutanich,

United States Attorney; Kevin D. Schiff, Assistant United States Attorney, counsel for the United States of America, and; Richard E. Tanasi, Esq., counsel for Defendant Miriam Elizabeth Suarez-Contreras (1); Chris T. Rasmussen, Esq., counsel for Defendant, Roberto Blancas-Mata (3); Paola M. Armeni, Esq., counsel for Defendant, Rahdsma Henderson (4); Brian James Smith, Esq., counsel for Defendant Stephen Lloyd (5); Lance J. Hendron, Esq., counsel for Defendant Charles Parr (6); Todd M Leventhal, Esq., counsel for Defendant Doug Stumpf (7); Gabriel L. Grasso, Esq.,

1 counsel for Defendant Brian Scarborough (8); James A. Oronoz, Esq., counsel for Defendant  
2 Quentin Armstrong (10); and Rebecca A. Levy, Assistant Federal Public Defendant, counsel for  
3 Defendant Jose Guillermo Tello-Albarran (11), Defendants, Ramiro Ramirez-Barajas (2); Cipriano  
4 Pineda-Acedo (11); and Martha Pedraza-Zamora have not made an appearance, that the pretrial  
5 motion deadline date was scheduled for December 23, 2019, be vacated and set to date and time  
6 convenient to the Court.

7 **IT IS FURTHER STIPULATED AND AGREED** that the deadlines for filing of any and  
8 all pretrial motions are hereby due on or before the 26<sup>th</sup> day of June, 2020.

9 **IT FURTHER STIPULATION AND AGREED** that the deadlines for filing of  
10 responsive pleadings, are hereby due on or before the 10<sup>th</sup> day of July, 2020.

11 **IT FURTHER STIPULATION AND AGREED** that the deadlines for filing any and all  
12 replies, are hereby due on or before the 17<sup>th</sup> day of July, 2020.

13 This Stipulation is entered into for the following reasons:

- 14 1. The pretrial motions deadline was December 23, 2019.
- 15 2. On June 6, 2019, the case was deemed complex case [DKT 89] as there are numerous  
16 defendants and voluminous discovery.
- 17 3. Counsel and each Defendant needs additional time to review discovery.
- 18 4. The Government is in the process of providing plea offers that could potentially resolve this  
19 matter for some or all the defendants. Defendant Barnes has already accepted a plea. Once offers  
20 are received, defense counsel will need time to speak to their clients about the offers as well as the  
21 case in general.
- 22 5. Only after the above communications with their clients, can Defense counsel make a final  
23 determination if any pretrial motions are warranted and/or whether trial is in the best interest of  
24 their client.
- 25 6. For these reasons, the parties cannot meet the current pretrial motion deadline of December  
26 23, 2019.
- 27 7. Further, the additional time will avoid wasting judicial resources on matters that may  
28 become moot after communications are had with the defendants.

8. Defendants Suarez-Contreras (1), Henderson (4), Stumpf (7), Scarborough (8), Armstrong (10), and Tello-Albarran (12) are detained and agree to the continuance.

9. Defendants Blancas-Mata (3), Lloyd (5), and Parr (6), who have appeared in this case are not in custody and long with the government agree to a continuance.

10. On December 12, 2019, Defendant, Renea Barnes changed her plea and the Court vacated the trial date as it related to her.

11. Defendants, Ramiro Ramirez-Barajas (2), Cipriano Pineda-Acedo (11) and Martha Pedraza-Zamora have not made an appearance in the above-captioned matter.

12. Additionally, denial of this requests for continuance could result in a miscarriage of justice.

13. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, 18 U.S.C. §3161(h)(7)(A), when considering the factors under 18 U.S.C. §§3161(h)(7)(B) and 3161(h)(7)(B)(iv).

14. The additional time requested herein is not sought for purposes of delay and the denial of this request for continuance could result in a miscarriage of justice.

15. For all the above-stated reasons, the ends of justice would be best served by the continuance of the deadlines of motions, calendar call and trial dates.

16. This is an amended third request for an extension of time to file pretrial motions.

DATED this 30<sup>th</sup> day of December, 2019.

NICHOLAS A. TRUTANICH  
UNITED STATES ATTORNEY

/s/ Kevin D. Schiff  
KEVIN D. SCHIFF  
Assistant United States Attorney

For Defendant Suarez-Contreras (1)

/s/ Richard Tanasi  
Richard Tanasi, Esq.

For Defendant Blancas-Mata (3)

/s/ Chris Rasmussen  
Chris T. Rasmussen, Esq.

For Defendant Rahdsma Henderson (4)

/s/ Paola M. Armeni  
Paola M. Armeni, Esq.

For Defendant Stephen Lloyd (5)

/s/ Brian Smith  
Brian James Smith, Esq.

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For Defendant Charles Parr (6)

/s/Lance J. Hendron  
Lance J. Hendron, Esq.

For Defendant Scarborough (8)

/s/Gabriel L. Grasso  
Gabriel L. Grasso, Esq.

For Defendant Quentin Armstrong (10)

/s/James A. Oronoz  
James A. Oronoz, Esq.

For Defendant Doug Stumpf (7)

/s/Todd M. Leventhal  
Todd M. Leventhal, Esq.

For Defendant Renea Barnes (9)

/s/Mace J. Yampolsky  
Mace J. Yampolsky, Esq.

For Defendant Jose Guillermo Tello-Albarran (12)

/s/Rebecca A. Levy  
Rebecca A. Levy, Federal Public Defender

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

CASE NO. 2:19-cr-0033-APG-VCF

4 Plaintiff,

5 vs.

6 MIRIAM ELIZABETH SUAREZ-CONTRERAS

(1), aka "Ella" aka "Liz",

7 RAMIRO RAMIREZ-BARAJAS (2),

8 aka "Sergio",

ROBERTO BLANCAS-MATA (3),

9 aka "Carlos Delgado",

**RAHDSMA HENDERSON (4)**, aka "Weezy"

10 STEPHEN LLOYD (5),

11 CHARLES PARR (6), aka "Charles Magnuson",

DOUG STUMPF (7),

12 BRIAN SCARBOROUGH (8),

RENEA BARNES (9), aka "Renea Valdez",

13 QUENTIN ARMSTRONG (10),

CIPRIANO PINEDA-ACEDO (11),

14 JOSE GUILLERMO TELLO-ALBARRAN (12),

15 and MARTHA PEDRAZA-ZAMORA (13),

16 Defendants.

17 **FINDINGS OF FACTS, CONCLUSIONS OF LAW AND ORDER**

18 Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court  
19 hereby finds that:

20 **CONCLUSIONS OF LAW**

21 Based upon the fact that counsel has agreed to a continuance, the Court hereby concludes  
22 that:

- 23 1. The pretrial motions deadline was December 23, 2019.
- 24 2. On June 6, 2019, the case was deemed complex case [DKT 89] as there are numerous
- 25 defendants and voluminous discovery.
- 26 3. Counsel and each Defendant needs additional time to review discovery.
- 27 4. The Government is in the process of providing plea offers that could potentially resolve this
- 28 matter for some or all the defendants. Defendant Barnes has already accepted a plea. Once

1 offers are received, defense counsel will need time to speak to their clients about the offers as well  
2 as the case in general.

3 5. Only after the above communications with their clients, can Defense counsel make a final  
4 determination if any pretrial motions are warranted and/or whether trial is in the best interest of  
5 their client.

6 6. For these reasons, the parties cannot meet the current pretrial motion deadline of December  
7 23, 2019.

8 7. Further, the additional time will avoid wasting judicial resources on matters that may  
9 become moot after communications are had with the defendants.

10 8. Defendants Suarez-Contreras (1), Henderson (4), Stumpf (7), Scarborough (8), Armstrong  
11 (10), and Tello-Albarran (12) are detained and agree to the continuance.

12 9. Defendants Blancas-Mata (3), Lloyd (5), and Parr (6), who have appeared in this case are  
13 not in custody and long with the government agree to a continuance.

14 10. On December 12, 2019, Defendant, Renea Barnes changed her plea and the Court vacated  
15 the trial date as it related to her.

16 11. Defendants, Ramiro Ramirez-Barajas (2), Cipriano Pineda-Acedo (11) and Martha Pedraza-  
17 Zamora have not made an appearance in the above-captioned matter.

18 12. Additionally, denial of this requests for continuance could result in a miscarriage of justice.

19 13. The additional time requested by this Stipulation is excludable in computing the time within  
20 which the trial herein must commence pursuant to the Speedy Trial Act, 18 U.S.C. §3161(h)(7)(A),  
21 when considering the factors under 18 U.S.C. §§3161(h)(7)(B) and 3161(h)(7)(B)(iv).

22 14. The additional time requested herein is not sought for purposes of delay and the denial of  
23 this request for continuance could result in a miscarriage of justice.

24 15. For all the above-stated reasons, the ends of justice would be best served by the continuance  
25 of the deadlines of motions, calendar call and trial dates.

26 16. This is an amended third request for an extension of time to file pretrial motions.

27 17. The ends of justice are served by granting said continuances and outweigh the best interest  
28 of the public and the Defendants' right to a speedy trial, since the failure to grant said continuance

1 would be likely result in a miscarriage of justice as it would deny the parties herein sufficient time,  
2 and the opportunity within which to effectively and thoroughly prepare and file pretrial motions,  
3 responses, and replies, and prepare for trial taking into account the exercise of due diligence.

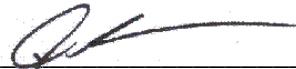
4 **ORDER**

5 **IT IS HEREBY ORDERED** that the deadlines for filing of any and all pretrial motions  
6 are hereby due on or before the 26<sup>th</sup> day of June, 2020.

7 **IT IS FURTHER ORDERED** that the deadlines for filing of responsive pleadings, are  
8 hereby due on or before the 10<sup>th</sup> day of July, 2020.

9 **IT IS FURTHER** that the deadlines for filing any and all replies, are hereby due on or  
10 before the 17<sup>th</sup> day of July, 2020.

11 **DATED** this 30th day of December, 2020.

12 

13 **UNITED STATES DISTRICT COURT JUDGE**  
14 **Case No. 2:19-cr-00133-APG-VCF**